

SUPPORTING STATEMENT FOR VA FORM 24-0296, DIRECT
DEPOSIT ENROLLMENT and 24-0296A, INTERNATIONAL DIRECT
DEPOSIT ENROLLMENT
(2900-0564)

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

On April 26, 1996, the President signed into law the Debt Collection Improvement Act of 1996 (DCIA). This legislation requires the use of electronic funds transfer (EFT) for most Federal payments starting January 2, 1999. Regulatory authority contained in 31 C.F.R. 208 and 210.4 provides the Secretary, Department of Veterans Affairs (VA) the right to authorize the appropriate disbursing officer to issue recurring benefit payments electronically to a financial institution for credit to an account designated by a VA benefit recipient. VA Form 24-0296 is the form used to gather the information required to enroll VA benefit recipients in the electronic funds transfer (EFT) program. The 24-0296 is designed for EFT enrollment in domestic banks.

This request is to reinstate VA Form 24-0296 (Direct Deposit Enrollment) and VA Form 24-0296A (International Direct Deposit Enrollment) which has expired. Due to the lapse in appropriations affecting several federal agencies and staff shortages we were unable to get this form renewed in time. In addition, we later received some comments to make changes to VA Form 24-0296A which was not enough time to get the changes in before the form expired.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The requested information will be used by VA to direct payment data to financial institutions for deposit into accounts designated by the benefit recipients.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The form is currently available on the VA website in electronic fillable format with data field intelligence. The form may also be printed and downloaded. Improved information technology cannot be used for this collection of information since the form must be collected directly from benefit recipients.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Program reviews were conducted to identify areas of duplication; however, none were found to exist.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Only benefit recipients use the forms; therefore, the collection of information does not impact small businesses or entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

EFT is a Department of Treasury initiative that provides the safe and timely delivery of payments to Federal benefits recipients. The inability to collect the information would adversely impact the agency's ability enroll benefit recipients in the DD/EFT program. The reduced number of enrollees will reduce the overall savings to the Federal government.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no special circumstances requiring collection in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to

submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The Department notice was published in the Federal Register on March 1, 2019, Volume 84, No. 41, page 7184.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no payments or gifts to respondents.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The records are maintained in the appropriate Privacy Act System of Records identified as "Compensation, Pension, Education, and Vocational Rehabilitation and Employment Records-VA (58VA21/22/28)," published at 74 FR 29275 on June 19, 2009, and last amended at 77 FR 42593 (July 19, 2012).

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The following sensitive information is requested on all forms: VA File Number, Payee's SSN, Bank Account number. The SSN and/or claim number serves to identify the enrollee and to confirm his/her entitlement to benefit payments. The bank information is needed to ensure funds are delivered to the proper financial institution and deposited into the proper account. Without this information, we could not process the EFT enrollment requests. The Debt Collection Act of 1996 requires the collection of this information. This law, which was signed into law on April 26, 1996, requires all Federal payments to be issued electronically beginning January 1, 1999.

12. Estimate of the hour burden of the collection of information:

Estimate of Information Collection Burden

a. Number of Respondents: 5,000

b. Frequency of Response: On occasion

c. Annual Burden Hours: 1,250 Burden Hours

Forms	Number of Respondents	Response Time	Respondent Burden
24-0296	3,000	15 minutes	750 hours
24-0296a	2,000	15 minutes	500 hours
Totals	5,000	15 minutes	1,250 hours

d. Estimated Completion Time: 15 Minutes

e. The respondent population for VA Form 24-0296 and 24-0296a is composed of individuals who are Veterans and beneficiaries. VA cannot make further assumptions about the population of respondents because of the variability of factors such as the educational background and wage potential of respondents. Therefore, VBA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is \$24.98 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm, May 2018.

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VBA estimates the total cost to all respondents to be \$31,225 (1,250 burden hours x \$24.98 per hour).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

This submission does not involve any recordkeeping costs.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would

not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Grade	Step	Burden Time	Hourly Rate	Cost Per Response	Yearly Responses	Cost
7	3	15	18.58	\$ 4.64	5,000.00	\$ 23,200.00
Overhead Cost						\$ 23,200.00
9	3	15	22.73	\$ 5.68	5,000.00	\$ 28,400.00
Overhead Cost						\$ 28,400.00
10	3	15	25.03	\$ 6.26	5,000.00	\$ 31,300.00
Overhead Cost						\$ 31,300.00
Processing / Analyzing Costs						\$ 165,800.00
Printing and Production Cost						\$ 1,817.22
Total Cost to Government						\$ 167,617.22

Overhead costs are 100% of salary and are same as the wage listed above and the amounts are included in the total.

Note: The hourly wage information above is based on the hourly 2019 General Schedule (Base) Pay (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf). This rate does not include any locality adjustment as applicable.

The processing time estimates above are based on the actual amount of time employees of each grade level spend to process to completion a claim received on this form. The within-grade step (3) of each employee represents the average experience of employees within each grade.

15. Explain the reason for any burden hour changes since the last submission.

There is no change in the reporting burden. VA Form 24-0296 needs to be reinstated with no changes and 24-0296A is being revised to change Question #17 to a fillable block.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The collected information is not for publication.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not seeking approval to omit the expiration date for OMB approval.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB 83-I.

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods.

The data collection does not employ statistical methods.